

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LEXINGTON INSURANCE COMPANY,

Plaintiff,

v.

DAVID FORREST and T. BEAUCLERC
ROGERS IV,

Defendants.

Civil Action No.
02-CV-4435

ORDER ADMITTING EDWARD P. KRUGMAN,
IRA J. DEMBROW AND SCOTT M. MORY
PRO HAC VICE

And now, this _____ day of _____, 2002, upon consideration of the Motion of Lexington Insurance Company for Admission of Edward P. Krugman, Ira J. Dembrow and Scott M. Mory *Pro Hac Vice*, and any response thereto, it is hereby ordered that the Motion is granted, and that Mr. Krugman, Mr. Dembrow and Mr. Mory are admitted *pro hac vice* to represent Lexington Insurance Company in this action and are permitted to participate actively in the conduct of all pretrial, trial and post-trial proceedings in this action.

BY THE COURT:

Anita B. Brody, U.S.D.J.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LEXINGTON INSURANCE COMPANY,

Plaintiff,

Civil Action No.
02-CV-4435

V.

DAVID FORREST and T. BEAUCLERC
ROGERS IV,

Defendants.

**MOTION OF LEXINGTON INSURANCE COMPANY
FOR ADMISSION OF EDWARD P. KRUGMAN,
IRA J. DEMBROW AND SCOTT M. MORY
*PRO HAC VICE***

The undersigned counsel for plaintiff, Lexington Insurance Company (“Lexington”), being a member in good standing of the bar of this Court, hereby moves this Court to admit Edward P. Krugman, Ira J. Dembrow and Scott M. Mory *pro hac vice*, and in support of said motion states as follows:

1. Edward P. Krugman is a member of the law firm of Cahill Gordon & Reindel,
with an address, telephone number and facsimile number as follows:

Edward P. Krugman, Esquire
Cahill Gordon & Reindel
80 Pine Street
New York, NY 10005
(212) 701-3000 (telephone)
(212) 269-5420 (fax)

2. Mr. Krugman is admitted to practice before and is in good standing with the following courts: (a) all state courts in New York; (b) the United States District Court for the

Southern District of New York; (c) the United States District Court for the Eastern District of New York; (d) the United States Court of Appeals for the Second Circuit; (e) the United States Court of Appeals for the Ninth Circuit; and (f) the United States Supreme Court.

3. Mr. Krugman has never been disciplined, suspended or disbarred, and there are no disciplinary proceedings against him in any jurisdiction.

4. Mr. Krugman has particular knowledge regarding the facts and law in the above-captioned action as a result of his long-term representation of Lexington, and Lexington has requested that he represent it in this action.

5. If Mr. Krugman is admitted *pro hac vice* in this matter, the undersigned will remain counsel of record.

6. Attached hereto as Exhibit "A" is a Certification of Edward P. Krugman in Support of Motion for Admission *Pro Hac Vice*.

7. Ira J. Dembrow is an associate of the law firm of Cahill Gordon & Reindel, with an address, telephone number and facsimile number as follows:

Ira J. Dembrow, Esquire
Cahill Gordon & Reindel
80 Pine Street
New York, NY 10005
(212) 701-3000 (telephone)
(212) 269-5420 (fax)

8. Mr. Dembrow is admitted to practice before and is in good standing with the following courts: (a) all state courts in New York; (b) the United States District Court for the Southern District of New York; (c) the United States District Court for the Eastern District of New York; and (d) the United States Court of Appeals for the Second Circuit.

9. Mr. Dembrow has never been disciplined, suspended or disbarred, and there are no disciplinary proceedings against him in any jurisdiction.

10. Mr. Dembrow has particular knowledge regarding the facts and law in the above-captioned action as a result of his long-term representation of Lexington, and Lexington has requested that he represent it in this action.

11. If Mr. Dembrow is admitted *pro hac vice* in this matter, the undersigned will remain counsel of record.

12. Attached hereto as Exhibit "B" is a Certification of Ira J. Dembrow in Support of Motion for Admission *Pro Hac Vice*.

13. Scott M. Mory is an associate of the law firm of Cahill Gordon & Reindel, with an address, telephone number and facsimile number as follows:

Scott M. Mory, Esquire
Cahill Gordon & Reindel
80 Pine Street
New York, NY 10005
(212) 701-3000 (telephone)
(212) 269-5420 (fax)

14. Mr. Mory is admitted to practice before and is in good standing with the following courts: (a) all state courts in New York and New Jersey; (b) all local courts in the District of Columbia; (c) the United States District Court for the Southern District of New York; (d) the United States District Court for the Eastern District of New York; and (e) the United States District Court for the District of Columbia.

15. Mr. Mory has never been disciplined, suspended or disbarred, and there are no disciplinary proceedings against him in any jurisdiction.

16. Mr. Mory has particular knowledge regarding the facts and law in the above-captioned action as a result of his representation of Lexington, and Lexington has requested that he represent it in this action.

17. If Mr. Mory is admitted *pro hac vice* in this matter, the undersigned will remain counsel of record.

18. Attached hereto as Exhibit "C" is a Certification of Scott M. Mory in Support of Motion for Admission *Pro Hac Vice*.

WHEREFORE, plaintiff, Lexington Insurance Company, respectfully requests that this Court grant the Motion for Admission of Edward P. Krugman, Ira J. Dembrow and Scott M. Mory *Pro Hac Vice* and permit Mr. Krugman, Mr. Dembrow and Mr. Mory to participate actively in the conduct of all pretrial, trial and post-trial proceedings in this action.

Jeffrey R. Lerman
Glenn F. Rosenblum
Montgomery, McCracken, Walker & Rhoads, LLP
123 South Broad Street
Philadelphia, PA 19109
(215) 772-1500

Attorneys for Plaintiff,
Lexington Insurance Company

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LEXINGTON INSURANCE COMPANY,

Plaintiff,

v.

DAVID FORREST and T. BEAUCLERC
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Civil Action No.
02-CV-4435

**MEMORANDUM OF LAW IN SUPPORT OF
MOTION OF LEXINGTON INSURANCE COMPANY FOR
ADMISSION OF EDWARD P. KRUGMAN,
IRA J. DEMBROW AND SCOTT M. MORY
PRO HAC VICE**

Plaintiff, Lexington Insurance Company ("Lexington"), pursuant to Local Civil Rule 83.5.2, moves for admission of Edward P. Krugman, Ira J. Dembrow and Scott M. Mory *pro hac vice*.

As set forth in the foregoing motion and attached certifications, each of the above-named attorneys is a member in good standing with courts of other jurisdictions. Each has particular knowledge regarding the facts and law in the above-captioned action as a result of his representation of Lexington, and Lexington has requested that the above-named attorneys represent it in this action.

If admitted *pro hac vice* in this matter, Mr. Krugman, Mr. Dembrow and Mr. Mory will have as associate counsel of record a member of the bar of this Court upon whom all pleadings, motions, notices and other papers can be served conformably to the Federal Rules of Civil Procedure and the rules of this Court.

Accordingly, Lexington requests that the Motion for Admission of Counsel *Pro Hac Vice* be granted.

Respectfully submitted,

Jeffrey R. Lerman
Glenn F. Rosenblum
Montgomery, McCracken, Walker & Rhoads, LLP
123 South Broad Street
Philadelphia, PA 19109
(215) 772-1500

Attorneys for Plaintiff,
Lexington Insurance Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Admission of Edward P. Krugman, Ira J. Dembrow and Scott M. Mory *Pro Hac Vice* was served this date upon the following by U.S. mail, first class, postage prepaid:

Nicholas M. Centrella, Esquire
Conrad, O'Brien, Gellman & Rohn, P.C.
16th Floor
1515 Market Street
Philadelphia, PA 19102-1916
Attorney for Defendant T. Beauclerc Rogers IV

I hereby certify that a true and correct copy of the foregoing Motion for Admission of Edward P. Krugman, Ira J. Dembrow and Scott M. Mory *Pro Hac Vice* was served this date upon the following by International Registered Mail and by Federal Express International Priority:

Mr. David Forrest
Fletland Mill House
Near Baston
Lincolnshire
PE6 9NS
ENGLAND

Date: _____

Jeffrey R. Lerman